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Industrial Telecommunications Association, Inc.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 27, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: PR Docket No. 92-235; Replacement of Part 90 by
Part 88 to Revise the Private Land Mobile Radio
Services

Notice of Ex Parte Presentation

Dear Mr. Caton:

Mark E. Crosby, President and Managing Director of the Industrial Telecommunications Association ("ITA"), and I met this date with Kathryn Hosford and Deborah Behlin of the Private Radio Bureau's "Refarming" Task Force to discuss ITA's position regarding channel splitting, competitive frequency coordination, consolidation of services and other key issues under consideration in the above-referenced rule making proceeding.

In this ex parte presentation, Mr. Crosby and I generally reiterated the views expressed in the Comments filed jointly in this proceeding on May 28, 1993 by ITA, the Council of Independent Communication Suppliers ("CICS") and the Telephone Maintenance Frequency Advisory Committee ("TELFAC").

Specifically, we urged support for a graceful transition to 12.5 kHz channelization in the 150-174 MHz and 450-512 MHz bands, with the ultimate goal of converting these bands to 6.25 kHz channels over a reasonable timeframe, provided that future improvements in technology make "feature-rich" 6.25 kHz systems possible. We also urged the Commission to consolidate the nineteen existing radio services into four service pools and to institute competitive frequency coordination.

In accordance with Section 1.1206(a)(2) of the Commission's rules, I am filing the original and one copy of this Notice of Ex Parte Presentation with the Secretary's office.

Sincerely,

Frederick J. Day

Frederick J. Day, Esq.
Executive Director,
Government Relations

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Formerly ~~SIRSA~~ the Special Industrial Radio Service Association, Inc.

Main Office: 1110 North Glebe Road • Suite 500 • Arlington, Virginia 22201 • (703) 528-5115 • FAX (703) 524-1074

Branch Office: 1270 Fairfield Road • Suite 33 • Gettysburg, Pennsylvania 17325 • (717) 334-0537 • FAX (717) 334-9602

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cc: Ms. Kathryn S. Hosford
Regina Keeney, Esq.
Mr. Ralph A. Haller
Mr. Gerald P. Vaughan

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"Refarming" Presentation
October 27, 1994

FEDERAL COMMUNICATIONS COMMISSION
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Channel Spacing

- Conversion plan tied to type-acceptance milestones
- New equipment sold after 1/1/1997 must be maximum 12.5 kHz or dual mode 12.5/25 kHz
- Ultimate conversion to 6.25 kHz channels after 12-15 years, provided that the technology exists to permit "feature-rich" equipment within 6.25 kHz bandwidths

Consolidation of Services

- Nineteen individual radio services is administratively cumbersome and inefficient
- Current frequency allocations are based on 1950's environment and reflect the unique needs of that era
- Consolidation of services will eliminate time-consuming and inefficient interservice coordination requirements
- Consolidation of services into four pools will rectify the disparity in frequencies allocated

Competitive Frequency Coordination

- The needs of licensees and users are of paramount importance
- Users should be able to select the coordinator best able to serve their needs and provide timely coordination
- Competitive coordination is consistent with the Commission's institutional reliance on competitive and marketplace forces to bring quality services to the public

Enhancement of Coordinator Responsibility

- ITA is willing to assume a greater role in efficient management of the radio spectrum
- FCC must delegate appropriate authority to the coordinators

150-174 MHz Frequency Band

	<u>Special Industrial</u>	<u>Railroad</u>
Total Number of Base/Mobile Frequencies (not including itinerant frequencies):	53	91
Number of Frequencies Allocated on an Exclusive Basis:	13	91
Number of Frequencies Shared with other Services:	40	0

450-470 MHz Frequency Band

	<u>Special Industrial</u>	<u>Railroad</u>
Total Number of Base/Mobile Frequencies (not including itinerant frequencies):	28	20
Number of Frequencies Allocated on an Exclusive Basis:	28	14
Number of Frequencies Shared with other Services:	0	6